



Stephanie L. Cesare, Esquire
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IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA : NO. 1:16-CR-103

v. : Judge Sylvia H. Rambo

MICHAEL CLARKE,
Defendant

:

AMENDED SENTENCING MEMORANDUM

AND NOW, comes Stephanie L. Cesare, Esquire, of ABOM & KUTULAKIS, LLP., on behalf of the Defendant, Michael Clarke, and respectfully offers the following Amended Sentencing Memorandum:

1. On April 20, 2016, a three-count Indictment was filed charging Defendant with violations of Title 18, United States Code Section 2251(a) and 2252A(a)(5)(B) and 2252(a)(1).
2. On November 15, 2016, Defendant entered a plea of guilty to the above-referenced statutes, production of child pornography, possession of child pornography and transporting child pornography.

2. On or about October 10, 2017, Defendant filed a Pre-Sentencing Memorandum under seal.

3. At the time of the aforementioned Memorandum and Brief, Undersigned Counsel had not yet received a letter from Donnie Lee Clarke and Edward Clarke (Defendant's Mother and Father). *Please see Exhibit 1.*

4. Undersigned Counsel has contacted United States Assistant Attorney Meredith Taylor, who concurs with including the additional letter from the Defendant's family in the Pre-Sentencing Memorandum.

Wherefore, it is respectfully requested that this Honorable Court amend the Pre-Sentencing Memorandum filed previously to include the additional letter from the Defendant's family.

Respectfully submitted,

ABOM & KUTULAKIS, L.L.P.

Date: October 20, 2017

Stephanie L. Cesare /s/
Stephanie L. Cesare, Esquire
Attorney I.D. No. 308102
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(717) 249-0900
Attorney for Defendant

CERTIFICATE OF SERVICE

AND NOW, this 20th day of October, 2017, I, Stephanie Cesare, Esquire, of ABOM & KUTULAKIS, LLP, hereby certify that I did serve a true and correct copy of the foregoing Amended Sentencing Memorandum was served upon the party named below via electronic means addressed as follows:

Meredith Taylor, Esquire
Assistant United States Attorney
meredith.taylor@usdoj.gov

Stephanie L. Cesare /s/
Stephanie L. Cesare, Esquire